



HECHTPARTNERS
LLP

Kathryn Lee Boyd
Partner
P: (646) 502-9515
E: lboyd@hechtpartners.com

July 1, 2021

VIA ECF

The Honorable John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *PDV USA, Inc. v. Interamerican Consulting Inc.*,
No. 1:20-cv-3699 (JGK)

Dear Judge Koeltl:

We represent Defendant in the above-referenced matter. On June 22, 2021, Your Honor denied Defendant's Motion to Dismiss the Amended Complaint, Dkt. 36, and ordered the parties to submit a Rule 26(f) report by July 6, 2021 and appear for a conference on July 13, 2021, Dkt. 37.

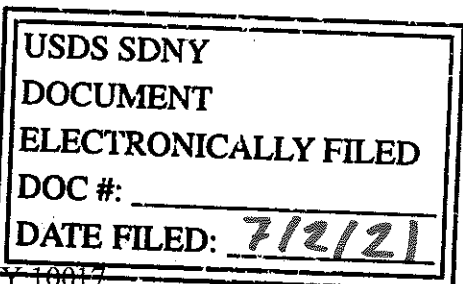
The undersigned is lead trial counsel in *Apple Inc. v. Corellium, LLC*, No. 9:19-cv-81160-RS, currently pending before Judge Rodney Smith in the Southern District of Florida. Judge Smith has scheduled a pretrial conference on July 13, 2021, with trial set to commence on July 19, 2021. See Dkt. 961. A joint request to adjourn the trial date to September was denied by the Court. Dkt. 960. Hecht Partners is a very small law firm and does not have additional attorneys to work on this matter. Accordingly, the undersigned cannot appear for the July 13, 2021 conference and needs further time to answer the Amended Complaint.

Pursuant to Federal Rule of Civil Procedure 6(b), Defendant respectfully requests that the Court extend the time for Defendant to answer the Amended Complaint for 30 days, to August 5, 2021. Defendant also requests that the Court adjourn the conference to the first week of August, or the earliest date thereafter that is convenient for the Court. The parties request that the Court reset the deadline for the Rule 26(f) report accordingly.

This is Defendant's first motion for an extension of time to file the Answer. Defendant previously requested two extensions of time to file the Motion to Dismiss, which the Court granted.

Plaintiff consents to this request.

We thank the Court for its consideration.



125 Park Avenue, 25th Floor, New York, NY 10017

Page 2

Respectfully,

/s Kathryn Lee Boyd

Kathryn Lee Boyd

125 Park Avenue, 25th Floor, New York, NY 10017